

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

CLEVELAND BROWNS FOOTBALL  
COMPANY LLC,

Plaintiff,

v.

THE CITY OF CLEVELAND,

Defendant,

STATE OF OHIO,

Intervenor.

Case No: 1:24-cv-1857

Judge David A. Ruiz

**DEFENDANT CITY OF CLEVELAND'S MOTION TO EXTEND THE TIME TO  
RESPOND TO THE AMENDED COMPLAINT AND MEMORANDUM IN SUPPORT**

Defendant City of Cleveland respectfully requests an additional 30 days to respond to Plaintiff's Amended Complaint.

This case was filed on October 24. Approximately three weeks later, an amended complaint was filed (Doc. No. 12) and the Court ordered an answer to be filed by December 16 (Nov. 15, 2024 Order). On December 9, just three days ago, the City retained Jones Day to represent it in this action.

Jones Day sought Plaintiff's consent for a 30-day extension (to January 15) to allow counsel sufficient time to respond to the allegations and legal issues raised by the Amended Complaint, taking into account the holidays. Plaintiff consented to just 7 days, necessitating this opposed motion.

The City does not seek additional time for purposes of delay, but, instead, to ensure that any briefing to the Court is well-researched and reasoned, a task worth additional time given the novel issues presented by the Amended Complaint. For these reasons, the City respectfully asks that its date to respond to the Amended Complaint be extended to January 15, 2025.

Dated: December 12, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

This is to certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves e-mail notification of such filing to the attorneys of record, each of whom is a registered participant in the Court's electronic notice and filing system and each of whom may access this filing via the Court's CM/ECF system.

Dated: December 12, 2024

*/s/ Justin E. Herdman*  
Justin E. Herdman

**LOCAL RULE 7.1 CERTIFICATION**

I certify that this case has not yet been assigned a track. This memorandum complies with the most stringent page limitations set forth in Local Rule 7.1.

*/s/ Justin E. Herdman*  
Justin E. Herdman